

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

NO. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

(Substantively Consolidated)

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 09-1161 (SMB)

Plaintiff,

v.

FEDERICO CERETTI, ET AL.

Defendants.

**STIPULATION EXTENDING TIME TO RESPOND TO FOURTH AMENDED
COMPLAINT**

Upon the request of defendant HSBC Bank Bermuda Limited (“Bank Bermuda”), by and through its undersigned attorneys, for a further extension of time beyond October 17, 2014, as

provided in the "Stipulation Extending Time To Respond To Fourth Amended Complaint And Setting Date For Pre-Trial Conference" [Doc. #120]; and the respective counsel for the Trustee and Bank Bermuda having conferred; it is hereby stipulated and agreed by and between the undersigned herein:

The deadline by which Bank Bermuda may move, answer or otherwise respond to the Fourth Amended Complaint is extended from October 17, 2014, up to and including December 16, 2014.

Nothing in this Stipulation is a waiver of Bank Bermuda's rights to request from the Court a further extension of the deadline set forth above, and/or the Trustee's right to object to any request.

Undersigned counsel for Bank Bermuda expressly represent: (i) service of the Summons and Complaint in the above-captioned adversary proceeding was properly effected upon them, and (ii) they have the authority to, and hereby waive any defenses based on insufficiency of process or insufficiency of service of process of the Summons and Complaint on behalf of Bank Bermuda. The parties to this Stipulation agree that entering into this Stipulation does not constitute submission by Bank Bermuda to the jurisdiction of this Court and, except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including to challenge the jurisdiction of the Court in this Court or any other court.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental

Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences
(ECF No. 7037) in the above-captioned case (No. 08-01789 (SMB)).

Dated: October 9, 2014
New York, New York

BAKER & HOSTETLER LLP

By: /s/ David J. Sheehan
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Geraldine E. Ponto
Email: gpointo@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Estate of Bernard L.
Madoff*

CLEARY GOTTLIEB STEEN &
HAMILTON LLP

By: /s/ David E. Brodsky
One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000
Facsimile: (212) 225-3999
David E. Brodsky
Email: dbrodsky@cgsh.com
Thomas J. Moloney
Email: tmoloney@cgsh.com

*Attorneys for Defendant HSBC Bank
Bermuda Limited*